

## **Exhibit A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**STIPULATION REGARDING THE THIRD JOINT MOTION OF THE DEBTORS  
AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
AN ORDER AUTHORIZING THE MOVANTS TO REDACT OR  
WITHHOLD CERTAIN CONFIDENTIAL INFORMATION OF CUSTOMERS**

This stipulation (“Stipulation”) is being entered into between FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), the Official Committee of Unsecured Creditors appointed in the above-captioned cases (the “Committee”), the United States Trustee for the District of Delaware (the “U.S. Trustee”) and Bloomberg L.P., Dow Jones & Company, Inc., The New York Times Company and The Financial Times Ltd (collectively, the “Media Intervenors” and, together with the Debtors, the Committee and the U.S. Trustee, the “Parties”).

**WHEREAS**, on November 23, 2023, the Court entered the *Interim Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on an Interim Basis and (III) Granting Certain Related Relief* [D.I. 157] (the “Interim Order”);

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

**WHEREAS**, on January 11, 2023, the Court entered the *Final Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on a Final Basis and (III) Granting Certain Related Relief* [D.I. 545] (the “Final Order”);

**WHEREAS**, on June 15, 2023, the Court entered the *Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals* [D.I. 1643] (the “First Extension Order”);

**WHEREAS**, on June 23, 2023, the Media Intervenors filed a notice of appeal regarding the First Extension Order [D.I. 1690];

**WHEREAS**, on October 24, 2023, the Court entered the *Second Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 3353] (the “Second Extension Order” and, together with the Interim Order, Final Order and First Extension Order, the “Orders”);

**WHEREAS**, on each of January 11, 2023, June 8, 2023, June 9, 2023 and October 24, 2023 (collectively, the “Prior Hearings”), the Court held an evidentiary hearing during which the Debtors and/or the Committee, as applicable, presented evidence on which the Court relied to enter the Orders;

**WHEREAS**, at the October 24, 2023 hearing, in connection with granting the Second Extension Order, the Court requested that the Parties find “some way to avoid another one of these hearings in 90 days where we don’t have to go through and hear the same testimony again” (Oct. 24, 2023 Hr’g Tr. 59:16-18);

**WHEREAS**, the Media Intervenors’ appeal of the First Extension order is currently pending before the United States District Court for the District of Delaware, Civil Action No. 23-682-CFC (the “Appeal”);

**WHEREAS**, on January 22, 2024, the Debtors filed the *Third Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 6153] (the “Third Extension Motion”), seeking entry of the *Third Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* (the “Third Extension Order”);

**WHEREAS**, the Third Extension Motion is scheduled for a hearing on February 22, 2024;

**WHEREAS**, the U.S. Trustee and the Media Intervenors have advised they oppose the relief requested in the Third Extension Motion, including, *inter alia*, because Debtors advised the Court at the hearing on January 31, 2024, that they do not plan to restart their FTX.com exchange;

**WHEREAS**, the Parties engaged in good faith discussions to comply with the Court’s directive; and

**WHEREAS**, it is the intention of the Parties to comply with the Court’s directive without prejudice to any of the Parties’ rights, claims, arguments, and defenses in this matter and in the Appeal;

**NOW, THEREFORE, IT IS HEREBY STIPULATED** by and among the undersigned counsel for the Parties as follows:

1. To avoid the need for an additional evidentiary hearing, and in light of the Court’s directive to the Parties at the October 24, 2023 hearing, the Parties agree that the Court may rule on the Third Extension Motion based on the existing record of the Prior Hearings and the pleadings filed to date.

2. All Parties' rights are reserved in the event that the Court declines to enter the Third Extension Order based on the existing record of the Prior Hearings, including specifically the Debtors' and the Committee's right to offer witness testimony and other evidence in support of the Third Extension Motion, and the U.S. Trustee's and the Media Intervenors' right to contest such evidence and offer argument opposing such an extension.

3. All Parties' rights are reserved in the event that the Court enters the Third Extension Order based on the existing record of the Prior Hearings, including the Media Intervenors' rights and arguments with respect to their Appeal.

4. All Parties' rights, claims and defenses with respect to any requests for further extensions of the redaction deadline are reserved.

5. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Third Extension Motion, except for those matters, claims, rights, or disputes for which the United States District Court for the District of Delaware currently has jurisdiction pursuant to Media Intervenors' Appeal.

February 12, 2024

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